

# EXHIBIT 6

## Stephen Stern

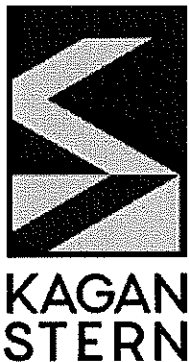
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**From:** Stephen Stern  
**Sent:** Thursday, October 28, 2021 11:07 PM  
**To:** Bruce L. Marcus  
**Cc:** Sydney M. Patterson; gjordan@jz-llc.com; tgagliardo@gelawyer.com  
**Subject:** RE: Daniel White Notice of Deposition  
**Attachments:** Second Amended Notice of Deposition (DWhite) (00156132xEC90E).pdf

Bruce:

Since I have not heard back from you or your colleague advising that November 4 does not work, I have taken you up on your offer and scheduled the deposition to begin at 12:30 pm on November 4. See the attached Second Amended Notice of Deposition.

Stephen



**Stephen B. Stern, Esq.**  
[stern@kaganstern.com](mailto:stern@kaganstern.com)

**Kagan Stern Marinello & Beard, LLC**  
(410) 793-1610 (direct)  
(410) 216-7900, ext. 1009  
(410) 705-0836 (fax)  
238 West Street  
Annapolis, Maryland 21401  
[www.kaganstern.com](http://www.kaganstern.com)

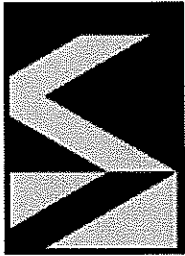
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**From:** Stephen Stern  
**Sent:** Monday, October 25, 2021 8:19 PM  
**To:** Bruce L. Marcus <bmarcus@marcusbonsib.com>  
**Cc:** Sydney M. Patterson <SPatterson@marcusbonsib.com>; gjordan@jz-llc.com; tgagliardo@gelawyer.com  
**Subject:** RE: Daniel White Notice of Deposition

I am available on November 4 and November 5. Please confirm Daniel White's availability.

Meanwhile, you have yet again ignored my request for immediate production of the documents that were originally due more than two months ago. Please have Daniel White produce all responsive documents immediately.

Stephen



**KAGAN  
STERN**

**Stephen B. Stern, Esq.**  
[stern@kaganstern.com](mailto:stern@kaganstern.com)

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Annapolis, Maryland 21401  
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**From:** Bruce L. Marcus <[bmarcus@marcusbonsib.com](mailto:bmarcus@marcusbonsib.com)>  
**Sent:** Saturday, October 23, 2021 9:33 AM  
**To:** Stephen Stern <[Stern@kaganstern.com](mailto:Stern@kaganstern.com)>  
**Cc:** Sydney M. Patterson <[SPatterson@marcusbonsib.com](mailto:SPatterson@marcusbonsib.com)>; [gjordan@jz-llc.com](mailto:gjordan@jz-llc.com); [tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)  
**Subject:** Re: Daniel White Notice of Deposition

Mr. Stern,

Thank you for your prompt response. While I was in flight yesterday afternoon, I did check e-mails when I landed late yesterday afternoon. And at your suggestion, I checked again this morning. I was unable to locate your responsive e-mail. Perhaps if you could share the e-mail you believe was sent I will attempt to locate your correspondence. I have sent Mr. White your last e-mail. I am unavailable on the 1st and 2nd but am available on the 4th and 5th, assuming of course, Mr. White and other counsel are available.

Hopefully, we can confirm a date with all counsel for the end on the week. Again, thank you for your response this morning. Have a nice weekend, all.

Bruce

Bruce L. Marcus  
MarcusBonsib, LLC  
6411 Ivy Lane  
Suite 116  
Greenbelt, Maryland 20770  
301-441-3000  
[bmarcus@marcusbonsib.com](mailto:bmarcus@marcusbonsib.com)

Sent from my ipad

On Oct 23, 2021, at 9:09 AM, Stephen Stern <[Stern@kaganstern.com](mailto:Stern@kaganstern.com)> wrote:

Mr. Marcus:

I do not appreciate you pretending that I did not respond. Please check your email again. I sent an email at 2:50 pm, identifying November 1 and November 2 as the dates for the deposition. I also inquired as to why your client has not produced the documents yet, as there is no reason why he cannot do that right away; they are long overdue.

Please check your email. These tactics will not work in postponing this deposition and document production longer.

Stephen

Get Outlook for iOS

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**From:** Bruce L. Marcus <bmarcus@marcusbonsib.com>  
**Sent:** Saturday, October 23, 2021 6:30:37 AM  
**To:** Stephen Stern <Stern@kaganstern.com>  
**Cc:** Sydney M. Patterson <SPatterson@marcusbonsib.com>; gjordan@jz-llc.com <gjordan@jz-llc.com>; tgagliardo@gelawyer.com <tgagliardo@gelawyer.com>  
**Subject:** Re: Daniel White Notice of Deposition

Good morning Mr. Stern,

I am writing to you again as I did not hear back from you prior to the close of business on Friday. If I missed your call or your e-mail response, please accept my sincere apologies.

As indicated in my e-mail of October 21, 2021 and the message left for you on voicemail in your office, I have tried to reach you to set a date for Mr. White's deposition on a date that Mr. White and I am available for his deposition. Mr. White's attempted murder jury trial begins on Monday, October 25 and he is required to be in Court in St. Mary's County. I had hoped to hear from you before today but I am certain that the press of other matters may have made that difficult for you.

I am copying Messrs. Jordan and Gagliardo inasmuch as they appear to be the other attorneys in the case and may not have heard from you either.

Again, please feel free to provide dates that may work for Mr. White's deposition. Thank you again in advance for what I anticipate will be your cooperation. Have a nice weekend.

**From:** "Bruce L. Marcus" <bmarcus@marcusbonsib.com>  
**Date:** October 21, 2021 at 5:11:52 PM EDT  
**To:** stern@kaganstern.com  
**Subject:** Daniel White Notice of Deposition

Dear Mr. Stern,

Please permit me to introduce myself. I have been retained to represent Daniel White in matters related to the Notice of Deposition issued to Mr. White. I tried to reach you by telephone and left a message so please excuse the formality of this correspondence.

Unfortunately, Mr. White is scheduled to be in trial on Monday in the Circuit Court for St. Mary's County in the case of State of Maryland v. Johnson, Case #'s 2018-114; 115 where the lead charge is Attempted Murder and the second charge Carjacking. The trial has been scheduled for some time. In addition, I am scheduled to be out of State next week,

but frankly Mr. White's conflict should well explain and justify his inability to appear. I am happy to arrange a time for his deposition convenient to all participants.

Please advise me on the discovery schedule in the case and the dates that may be available to you and other counsel. Thank you in advance for your anticipated courtesy and cooperation in scheduling this deposition.

Sincerely,

Bruce L. Marcus  
MarcusBonsib, LLC  
6411 Ivy Lane  
Suite 116  
Greenbelt, Maryland 20770  
301-441-3000  
[bmarcus@marcusbonsib.com](mailto:bmarcus@marcusbonsib.com)

Sent from my ipad

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**DAVID J. BOSHEA**

**Plaintiff,**

**v.**

**COMPASS MARKETING, INC.**

**Defendant.**

**Case No. 1:21-CV-00309-ELH**

\* \* \* \* \*

**SECOND AMENDED NOTICE OF DEPOSITION OF DANIEL J. WHITE**

PLEASE TAKE NOTICE THAT Defendant Compass Marketing, Inc., by and through its undersigned counsel and pursuant to the Federal Rules of Civil Procedure and the Local Rules of this Court, will take the deposition on oral examination of Daniel J. White. This deposition notice follows the Court's Order denying your Motion to Quash and is in furtherance of the subpoena that was previously served on you. The deposition will take place at 8 Church Circle, Annapolis, Maryland 21401. The deposition will take place on the Fourth Floor, Conference Room 407, commencing at 12:30 p.m. on November 4, 2021, and may be continued from day to day or to such other date as may be necessary until completed. Please note that masks are required in the courthouse and must be worn at all times.

The deposition will be taken before a court reporter or other person authorized to administer oaths and will be conducted in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court. The deposition will be taken for the purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the applicable rules. The deposition will be recorded stenographically and will be videotaped.

Dated: October 28, 2021

Respectfully submitted,

/s/ Stephen B. Stern

Stephen B. Stern, Bar No. 25335

Heather K. Yeung, Bar No. 20050

KAGAN STERN MARINELLO & BEARD, LLC

238 West Street

Annapolis, Maryland 21401

Telephone: (410) 216-7900

Facsimile: (410) 705-0836

Email: [stern@kaganstern.com](mailto:stern@kaganstern.com)

Email: [yeung@kaganstern.com](mailto:yeung@kaganstern.com)

*Counsel for Defendant*

*Compass Marketing, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28th day of October, 2021, the foregoing Second Amended Notice of Deposition for Daniel J. White was served via electronic mail to:

Thomas J. Gagliardo  
Gilbert Employment Law, PC  
1100 Wayne Avenue, Suite 900  
Silver Spring, MD 20910  
Email: [tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)

and

Gregory J. Jordan  
Mark Zito  
Jordan & Zito, LLC  
55 West Monroe St., Suite 3600  
Chicago, IL 60603  
Email: [gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)

*Attorneys for Plaintiff*  
*David Boshea*

/s/ Stephen B. Stern  
Stephen B. Stern